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12 *Debashis Bagchi and Jon Bengtson*

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

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**Jaime Martorell, an individual**

**Plaintiff,**

**vs.**

**Debashis Bagchi, an individual and Jon Bengtson, an individual,**

**Defendants.**

**CASE NO.: 3:19-cv-00523-MMD-CLB**

**Stipulation to Amend the Discovery Cut-off Deadline**

*(Second Request)*

Defendants, Debashis Bagchi and Jon Bengtson, by and through their counsel, Pete Cladianos III, Esq., and Charles R. Zeh, Esq., The Law Offices of Charles R. Zeh, Esq., and the plaintiff, Jaime Martorell, by and through his counsel, Anthony Hall, Esq., and Jeremy Clarke, Esq., Simons Hall Johnston PC, do hereby stipulate and agree to amend the Stipulated Discovery Plan and Scheduling Order dated October 28, 2019, to extend the deadlines for the close of discovery, currently scheduled for July 31, 2020.

The discovery completed so far has been the exchange of initial and supplemental disclosures by each side and the exchange of interrogatories and requests for production. At this juncture, the parties anticipate depositions of the parties and potentially, expert witnesses. The reason for this request is that the parties each have concerns regarding the others' responses to interrogatories and requests for production. A meet and confer conference is scheduled for later

this month. However, should the parties not able to resolve their concerns during this conference, any motion cycle to compel discovery would extend beyond the deadline. Accordingly, the parties have agreed to extend the deadline for the close of discovery to September 11, 2020. All other deadlines set forth in this matter shall remain in effect.

This is the second request for an extension of the close of discovery.

Dated: July 10, 2020

Dated: July 10, 2020


By: /s/ Jeremy Clarke, Esq.  
 Jeremy Clarke, Esq.  
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*Attorneys for defendants*

ORDER

IT IS SO ORDERED.

Dated this 13th day of July, 2020.

  
 United States District Court Judge  
~~XXXXXXXXXXXXXXXXXXXX~~  
 UNITED STATES MAGISTRATE JUDGE

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